

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

Western DIVISION

FILED

MAY 24 2011

DENNIS P. JAWARONE, CLERK  
U.S. DISTRICT COURT, EDNC  
BY [Signature] DEP. CLK

Natia Charisses Ridges,  
\_\_\_\_\_  
\_\_\_\_\_

(Enter above the full name  
of the Plaintiff[s] in this  
action).

Case No. 5:11-CV-250-BO  
(To be assigned  
by the Clerk of  
District Court)

vs.  
Underwriters Laboratories  
INC  
\_\_\_\_\_  
\_\_\_\_\_

(Enter above the full name of  
**ALL** Defendant[s] in this action.  
Fed.R.Civ.P.10(a) requires that  
the caption of the complaint  
include the names of **all** the  
parties. Merely listing one  
party and "et al." is insufficient.  
Please attach additional sheets if  
necessary).

COMPLAINT

1. Plaintiff resides at 12200 Oakwood View Dr  
Apt 205, Raleigh NC 27614  
\_\_\_\_\_

2. Defendant(s) name(s): Underwriters Laboratories  
333 Pfingsten Rd, Northbrook IL  
60062  
\_\_\_\_\_  
\_\_\_\_\_

Location of principal office(s) of the named defendant(s):

333 Pfingsten Rd  
Northbrook IL 60062

Nature of defendant(s) business: Third-Party

Safety Certification

Approximate number of individuals employed by defendant:

Oren 7500 employees globally

3. This action is brought pursuant to Title VII of the Civil Rights Act of 1964 for employment discrimination. Jurisdiction is specifically conferred on this court by 42 U.S.C. § 2000e-5. Equitable and other relief are also sought under 42 U.S.C. § 20003-5(q).

4. The acts complained of in this suit concern:

(A) \_\_\_\_\_ Failure to employ me.

(B) \_\_\_\_\_ Termination of my employment.

(C) \_\_\_\_\_ Failure to promote me.

(D) ☒ Other acts as specified below:

Discriminated against based on Civil Rights Act of 1964, ADA.

COMPANY' HAD WORK FROM HOME POLICY FOR employees (WAS NOT) GIVEN opportunity when white colleagues were on a permanent basis to take for family members.

Asked to work from home in (sick child)  
Oct 2009, I WAS told no, white  
colleagues were ALWAYS Allowed  
to work from home to care for  
family members.

5. Plaintiff is:

(A) \_\_\_\_\_ presently employed by the defendant.

(B) ☒ not presently employed by the defendant.

The dates of employment were \_\_\_\_\_.

Employment was terminated because:

(1) \_\_\_\_\_ plaintiff was discharged.

(2) ☒ plaintiff was laid off.

(3) \_\_\_\_\_ plaintiff left job voluntarily.

6. Defendant(s) conduct is discriminatory with respect to the following:

(A) \_\_\_\_\_ my race.

(B) \_\_\_\_\_ my religion.

(C) \_\_\_\_\_ my sex.

(D) \_\_\_\_\_ my national origin.

(E) ☒ other as specified below:

Americans with Disabilities  
Family Responsibilities Discrimination  
FMLA

7. The name(s), race, sex, and the position or title of the individual(s) who allegedly discriminated against me during the period of my employment with the defendant company is (are):

Drew Hearn Underwriters Laboratories  
INC  
My immediate supervisor

8. The alleged discrimination occurred on or about \_\_\_\_\_

10/2009

9. The nature of my complaint, i.e., the manner in which the individuals(s) named above discriminated against me in terms of the conditions of my employment is as follows:

Drew Hearn denied me same opportunities to care for minor children As white colleagues my absences were negative employment events White colleagues allowed flexible working situations to care for family members no negative events I was harassed after I filed complaint OCT 2009

10. The alleged illegal activity took place at: during my employment from 01/2009 to FEB 2011

11. I filed charges with the Equal Employment Opportunity Commission regarding defendant(s) alleged discriminatory conduct on or about 10/09/2009. I have attached a copy of the Notice of Right to Sue letter issued by the Equal Employment Opportunity Commission. This letter was received by me on 3/15/2011

12. I seek the following relief:

- (A) \_\_\_\_\_ recovery of back pay;
- (B) \_\_\_\_\_ reinstatement to my former job;
- (C) X trial by jury on all issues so triable;

and any other relief as may be appropriate, including  
injunctive orders, damages, costs and attorney's fees.

5/18/2011  
Date

Nadia Charisses Ridges  
Signature of Plaintiff  
12200 Oakwood View Dr  
Apt 205  
Raleigh NC 27614  
919-600-1221  
Address and Phone Number of Plaintiff

**U.S. EQUAL EMPLOYMENT OPPORTUNITY COMMISSION**  
**NOTICE OF RIGHT TO SUE (ISSUED ON REQUEST)**

To: **Natia C. Ridges**  
**12200 Oakwood View Dr**  
**Apt 205**  
**Raleigh, NC 27614**

From: **Raleigh Area Office**  
**1309 Annapolis Drive**  
**Raleigh, NC 27608**



On behalf of person(s) aggrieved whose identity is  
**CONFIDENTIAL (29 CFR §1601.7(a))**

EEOC Charge No.

EEOC Representative

Telephone No.

**846-2009-63883**

**Nancy L. Chapman,**  
**Investigator**

**(919) 856-4094**

*(See also the additional information enclosed with this form.)*

**NOTICE TO THE PERSON AGGRIEVED:**

**Title VII of the Civil Rights Act of 1964, the Americans with Disabilities Act (ADA), or the Genetic Information Nondiscrimination Act (GINA):** This is your Notice of Right to Sue, issued under Title VII, the ADA or GINA based on the above-numbered charge. It has been issued at your request. Your lawsuit under Title VII, the ADA or GINA **must be filed in a federal or state court WITHIN 90 DAYS of your receipt of this notice;** or your right to sue based on this charge will be lost. (The time limit for filing suit based on a claim under state law may be different.)



More than 180 days have passed since the filing of this charge.



Less than 180 days have passed since the filing of this charge, but I have determined that it is unlikely that the EEOC will be able to complete its administrative processing within 180 days from the filing of this charge.



The EEOC is terminating its processing of this charge.



The EEOC will continue to process this charge.

**Age Discrimination in Employment Act (ADEA):** You may sue under the ADEA at any time from 60 days after the charge was filed until 90 days after you receive notice that we have completed action on the charge. In this regard, **the paragraph marked below applies to your case:**



The EEOC is closing your case. Therefore, your lawsuit under the ADEA **must be filed in federal or state court WITHIN 90 DAYS of your receipt of this Notice.** Otherwise, your right to sue based on the above-numbered charge will be lost.

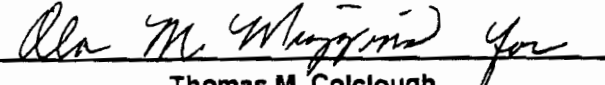


The EEOC is continuing its handling of your ADEA case. However, if 60 days have passed since the filing of the charge, you may file suit in federal or state court under the ADEA at this time.

**Equal Pay Act (EPA):** You already have the right to sue under the EPA (filing an EEOC charge is not required.) EPA suits must be brought in federal or state court within 2 years (3 years for willful violations) of the alleged EPA underpayment. This means that **backpay due for any violations that occurred more than 2 years (3 years) before you file suit may not be collectible.**

If you file suit, based on this charge, please send a copy of your court complaint to this office.

On behalf of the Commission

  
**Thomas M. Colclough,**  
**Director**

**03/15/2011**  
 (Date Mailed)

Enclosures(s)

CC: **Cecil W. Harrison Jr.**  
**Attorney**  
**POYNER SPRUILL**  
**P.O. Box 1801**  
**Raleigh, NC 27602**